

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

WARREN RICHARDS, on behalf of himself
and others similarly situated,

Plaintiff,

v.

GOOSE CREEK CANDLES LLC,

Defendant.

CASE NO. 1:25-CV-1188-JRS-MJD

DEFENDANT’S PRELIMINARY WITNESS AND EXHIBIT LISTS

Defendant, Goose Creek Candles LLC, pursuant to the Case Management Plan entered on September 17, 2025 (DN 21), submits its preliminary witness and exhibits lists, as follows:

A. WITNESS LIST

Goose Creek may call the following individuals to testify at the trial of this matter:

1. Plaintiff, Warren Richards, and any members of any certified class;
2. Jordan Meece, Chief Marketing Officer of Goose Creek Candles LLC;
3. Any representative of Goose Creek Candles LLC;
4. Any representative of Ghostmonitor, Inc. d/b/a Recart;
5. Any individuals identified during depositions or within documents produced by parties;
6. Any witnesses necessary to provide rebuttal testimony;
7. Any witnesses identified or called by the Plaintiff, or any member of any certified class;
8. Any individuals necessary to authenticate or provide foundational evidence for the admission of exhibits.

B. EXHIBIT LIST

Goose Creek may use or introduce as exhibits at trial any of the following:

1. Audit Log
2. Any agreement between Goose Creek Candles LLC and Ghostmonitor, Inc. d/b/a Recart;
3. Any records pertaining to or constituting advertisements and/or communications sent to customers
4. Consents obtained from Plaintiff, or other customers, related to communications
5. Any exhibit listed by Plaintiff or any member of any certified class;
6. All pleadings and other materials filed by the parties;
7. Any document needed to rebut testimony of Plaintiff's witnesses;
8. Any documents or things that Goose Creek Candles LLC intends to use for demonstrative purposes, whether prepared in advance of, or at, trial, to assist with presentation of facts;
9. All documents produced by the parties in this action.

Goose Creek Candles LLC reserves the right to amend and supplement its witness and exhibit lists to identify additional witnesses or exhibits, in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Alisa Micu

Chadwick A. McTighe

Alisa Micu

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Counsel for Goose Creek Candles LLC

CERTIFICATE OF SERVICE

I certify that on October 13, 2025, I filed the foregoing document with the Court's CM/ECF system, which serves notice upon the following:

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/s/ Alisa Micu

Counsel for Goose Creek Candles LLC

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